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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	CASE NO. 10-35547-HDH
PRM DEVELOPMENT, LLC,	§	
	§	CHAPTER 11
Debtor.	§	
	§	
In re:	§	
	§	CASE NO. 10-35551-SGJ
ECONOMETRIC MANAGEMENT, INC.,	§	
	§	CHAPTER 11
Debtor.	§	

In re:	§	
	§	CASE NO. 10-36161-BJH-11
HANS LOLLICK LAND COMPANY,	§	
LLLP,	§	CHAPTER 11
	§	
Debtor.	§	
In re:	§	
	§	CASE NO. 10-36159-BJH-11
LITTLE HANS LOLLIK HOLDINGS,	§	
LLP,	§	CHAPTER 11
	§	
Debtor.	§	

**JOINT MOTION FOR ORDER DIRECTING PROCEDURAL JOINT
ADMINISTRATION PURSUANT TO FEDERAL RULE OF BANKRUPTCY
PROCEDURE 1015 AND LOCAL RULE OF BANKRUPTCY PROCEDURE 1015**

TO THE HONORABLE HARLIN D. HALE
UNITED STATES BANKRUPTCY JUDGE:

PRM Development, LLC (“PRM Development”), Econometric Management, Inc. (“EMI”), Hans Lollick Land Company, LLLP (“Great Hans”), and Little Hans Lollick Holdings, LLP (“Little Hans”), debtors and debtors-in-possession in the above-captioned bankruptcy cases, hereby submit this motion (the “Motion”) pursuant to Federal Rule of Bankruptcy Procedure 1015 and Local Rule of Bankruptcy Procedure 1015. In support of this Motion, the Debtors respectfully represent as follows:

I. JURISDICTION AND VENUE

1. The Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (O) and this Motion is proper in this district pursuant to 28 U.S.C. §§ 1408.

2. The statutory basis for relief requested herein is Federal Rule of Bankruptcy Procedure 1015 and L.B.R. N.D. TX 1015.

II. BACKGROUND

3. On August 6, 2010, PRM Development and EMI filed for bankruptcy protection under chapter 11 of the Bankruptcy Code.¹ On September 3, 2010, Great Hans and Little Hans filed for bankruptcy protection under chapter 11 of the Bankruptcy Code.² Pursuant to Sections 1107 and 1108 of the Bankruptcy Code, the Debtors continue to operate their businesses and manage their property as Debtors in possession.

4. On August 20, 2010, PRM Development and EMI filed their Joint Motion for Order Directing Procedural Joint Administration Pursuant to Federal Rule of Bankruptcy Procedure 1015 and Local Rule of Bankruptcy Procedure 1015, which motion was heard and denied without prejudice on September 1, 2010.

5. PRM Development is a Delaware limited liability company formed in January 2001 for the purpose of holding interests in Great Hans and Little Hans, which directly own two unique islands located in the United States Virgin Islands (“USVI”) located approximately one and a half miles from the north coast of St. Thomas. PRM Management of Illinois, Inc. manages PRM Development. PRM Realty Group, LLC, a Ch. 11 debtor in possession before this Court, manages PRM Management of Illinois, Inc. and is the 100% owner of PRM Development. Peter R. Morris, also a Ch. 11 debtor in possession, is the president of PRM Realty Group, LLC.

6. EMI is a Texas corporation formed for the purpose of directly and/or indirectly managing real property. Bruce R. Tizes is the President and current manager of EMI. Mr. Tizes owns 95% of the interests in EMI, while Richard Blumberg owns 5% of the interests.

7. Great Hans is a USVI limited liability limited partnership formed in October 2002 for the purpose of holding an undeveloped 510 acre island in the USVI known as Hans Lollick.

¹ 11 U.S.C. §§ 101 *et. seq.*

² *Id.*

PRM Development and EMI are the general partners of Great Hans and each hold a 0.1% interest in Great Hans. Additionally, PRM Development (33.230%) and EMI (66.570%) are the limited partners of Great Hans.

8. Little Hans is a Delaware limited liability partnership formed in April 2002 for the purpose of holding an undeveloped 100 acre island in the USVI known as Little Hans Lollik. PRM Development (33.33%) and EMI (66.67%) are the partners and managers of Little Hans.

9. These bankruptcy cases were filed because of immediate and long term cash flow concerns associated with both Debtors' businesses. In an effort to balance the cash needs and manage their respective debts fairly among all creditors and equity interest owners, the Debtors determined that these filings were necessary.

III. RELIEF REQUESTED

10. The Debtors request the Court to order the joint administration of the Debtors' bankruptcy cases. The Court may order the joint administration of the estates of a debtor and an affiliate and a debtor and its general partner. The applicable authority for this proposition is found in Fed. R. Bankr. Pro. 1015(b), which provides in relevant part as follows:

If...two or more petitions are pending in the same court by ... (2) a partnership and one or more of its general partners, ... (4) a debtor and an affiliate, the court may order a joint administration of the estates.

11. The Debtors qualify for joint administration under Bankruptcy Rule 1015(b). PRM Development, Great Hans, and Little Hans have the same effective controlling manager, Peter R. Morris through PRM Realty Group, LLC, both of whom are also Chapter 11 debtors before this Court. Additionally, PRM Development is a general partner of and total 33.33% owner of Great Hans and a 33.33% owner of Little Hans. EMI is a 66.67% owner of both Great Hans and Little Hans. Thus, the Debtors qualify for joint administration because they are

affiliates within the meaning of 11 U.S.C. § 101(2) and because PRM Development and EMI are partners of Great Hans and Little Hans. Accordingly, the Court is authorized pursuant to Bankruptcy Rule 1015(b) to grant the relief requested herein.

12. The Debtors believe that the joint administration of these chapter 11 cases is warranted because the financial affairs, equity interests, and business operations of the Debtors are closely related. Because of the Debtors' relationship to the Hans Lollick islands, the reorganization of all four debtors is ultimately dependent upon each other. The Debtors share many creditors and parties in interest, and entry of an order directing joint administration of these cases will obviate the need for duplicative notices, applications, and orders. As such, joint administration will save considerable time and expense for the Debtors, their creditors and parties in interest, and the Court and also result in substantial savings to their respective estates.

13. Furthermore, the rights of the respective creditors of the Debtors will not be adversely affected by joint administration of these cases because this Motion requests only administrative consolidation of the estates. The Debtors are not at this time seeking substantive consolidation. Each creditor will be required to file a claim against a particular debtor's estate. Thus, even though the creditors' rights will not be depleted by treating the Debtors' bankruptcies as one, the rights of all creditors will be enhanced by the reduced costs resulting from joint administration.

14. Joint administration will also result in increased judicial economy, relieving this Court of the burden of entering duplicative orders and maintaining duplicative files. Judicial economy is served by marshalling the resources of the courts in this district. Finally, supervision of the administrative aspects of these chapter 11 cases by the Office of the United States Trustee will be simplified.

15. By reason of the foregoing, the Debtors submit that the best interests of their creditors and their estates would be served by the joint administration of these cases. Accordingly, the Debtors request that the caption of their cases be modified to reflect the joint administration of the chapter 11 cases as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	
PRM DEVELOPMENT, LLC, <i>et al.</i>,	§	CASE NO. 10-35547-HDH
	§	(Jointly Administered)
Debtors.¹	§	
	§	

¹The Debtors are PRM Development, LLC, Case No. 10-35547-HDH-11, Econometric Management, Inc., Case No. 10-35551-SGJ011, Hans Lollick Land Company, LLLP, Case No. 10-36161-BJH-11, and Little Hans Lollik Holdings, LLP, Case No. 10-36159-BJH-11.

16. The Debtors also seek the Court's direction that a notation in substantially the following form be entered on each of the Debtor's docket sheet to reflect the joint administration of the cases:

An order has been entered directing the procedural consolidation and joint administration of PRM Development, LLC, Case No. 10-35547-HDH-11, Econometric Management, Inc., Case No. 10-35551-HDH-11, Hans Lollick Land Company, LLLP, Case No. 10-36161-BJH-11, and Little Hans Lollik Holdings, LLP, Case No. 10-36159-BJH-11, in accordance with Federal Rule of Bankruptcy Procedure 1015(b). The docket for PRM Development, LLC, Case No. 10-35547-HDH-11, should be consulted for all matters affecting these cases.

17. The 341 meetings for each of the Debtors will proceed as scheduled and counsel for each respective Debtor will be present.

18. In summary, the Debtors request that their cases be jointly administered for procedural purposes to the extent of the following:

- a. One docket shall be maintained for the Debtors' cases, under the case number assigned to PRM Development;
- b. All pleadings, orders and other papers filed shall be captioned with the style reflected above, and shall reflect that the cases are jointly administered under the case number assigned to PRM Development;
- c. The United States Trustee shall conduct the first meeting of creditors for each of the Debtors as scheduled;
- d. Counsel for Debtors shall prepare and maintain one Official Service List pursuant to a Motion for Order Establishing Notice Procedures and Limiting Notice;
- e. Each of the Debtors shall file separate Schedules of Assets and Liabilities, Statements of Financial Affairs and, as applicable, Lists of Equity Security Holders;
- f. Proofs of claim filed by creditors of any Debtor shall reflect the style and case number of the Debtor to which the claim relates and in whose case such claim is to be filed; and
- g. Separate claims registers shall be maintained for each Debtor.

WHEREFORE, the Debtors respectfully request this Court to enter an order granting the relief requested herein and granting such other and further relief as may be just and proper.

Dated: September 7, 2010.

Respectfully submitted,

/s/ Melanie P. Goolsby

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*with permission /s/ Melanie P. Goolsby

CERTIFICATE OF CONFERENCE

I, the undersigned, hereby certify that, on September 7, 2010, I contacted Ms. Erin Schmidt of the United States Trustee's office by phone regarding the relief sought in this Motion, who indicated that the United States Trustee does not object to an expedited hearing on the Motion, but reserves the right to object or agree to the relief requested in the Motion. I further certify that, on September 7, 2010, I contacted Mr. John Lewis, Jr., counsel for Liberty Bankers Life Insurance Company ("Liberty"), regarding the relief sought in this Motion, who indicated that Liberty objects to the relief requested herein and an expedited hearing on same.

/s/ Melanie P. Goolsby

Melanie P. Goolsby